

REMARKS

The Applicant thanks the Examiner for the careful consideration of this application. Claims 1-20 are currently pending. Claims 1-3, 5-7, 9, 11-14, 16, and 17 have been amended. Claims 14, 15, and 17-19 were previously withdrawn in response to a restriction requirement. Based on the foregoing amendments and the following remarks, the Applicant respectfully requests that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Priority

The Office Action acknowledged Applicant's claim of priority to TO 2002A000876, but noted that a certified copy has not been filed in the present application. Applicant submits herewith a copy of the PCT/IB/304 (Notification Concerning Submission or Transmittal of Priority Document) issued in the parent international application. Accordingly, the Applicant requests that the Office acknowledge receipt of the certified copy in its next communication to Applicant.

Claim Objections

The Office Action objected to claim 16 for containing reference numbers in parentheses. Claim 16 has been amended to remove all reference numbers. Claims 12-14 and 17 have also been amended to remove all reference numbers. Accordingly, the Applicant requests that this objection be withdrawn.

Rejections under 35 U.S.C. § 112

The Office Action rejected claims 12 and 16 under 35 U.S.C. § 112, second paragraph, as being indefinite. Specifically, the Office Action asserts that the specification does not define “alternating motion in relation to the print medium.” The Applicant traverses this rejection. Nevertheless, solely to further prosecution, claims 12 and 16 have been amended to recite movement “back-and-forth along the direction of printing” with respect to the print medium. Accordingly, the Applicant requests that this rejection be withdrawn.

Rejections under 35 U.S.C. § 102

The Office Action rejects claims 1-4, 6-11, 13, and 20 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,439,908 to Silverbrook (“Silverbrook”). The Applicant traverses this rejection. Nevertheless, solely to further prosecution, claims 1 and 13 have been amended. The Applicant submits that claims 1 and 13 are patentable over Silverbrook for at least the following reasons.

First, Silverbrook does not disclose “a plurality of ejection modules each having chambers . . . spaced apart from one another along a direction of printing at a constant pitch,” as recited by claim 1. Support for this recitation of claim 1 can be found, for example, in Fig. 4 and paragraph [0044] of the present application. The Office Action apparently aligns the ink chambers 30 of Silverbrook’s FIG. 8 with the claimed “chambers.” However, the ink chambers 30 are not spaced apart from one another along the direction of printing (parallel to the length of assembly 10) at a *constant pitch*, as claimed. Rather, as shown, for example, in Silverbrook’s FIG. 2, the spacing of

the ink chambers 30 are staggered. Accordingly, Silverbrook does not disclose “a plurality of ejection modules each having chambers . . . spaced apart from one another along a direction of printing at a constant pitch,” as recited by claim 1.

Second, Silverbrook does not disclose “an elongated feeding duct for the ink [that] extends substantially parallel to the direction of printing,” as recited by claim 1. The Office Action aligns the ink nozzles 42 of Silverbrook’s FIG. 3 with the claimed “feeding duct.” However, the ink nozzles 42 do not extend substantially parallel to the direction of printing (parallel to the length of assembly 10). Rather, as shown in Silverbrook’s FIG. 11, the ink nozzles 42 extend through the cover molding 28 *transverse* to the direction of printing. Accordingly, Silverbrook does not disclose “an elongated feeding duct for the ink [that] extends substantially parallel to the direction of printing,” as recited by claim 1.

Independent claim 13 includes similar features to claim 1, and is patentable over Silverbrook for at least the same two reasons. Claims 2-4, 6-11, and 20 depend variously from claims 1 and 13, and are patentable for at least the same reasons.

Rejections under 35 U.S.C. §103

(1) The Office Action rejects claim 5 under 35 U.S.C. § 103(a) as being unpatentable over Silverbrook in view of U.S. Patent No. 6,039,441 to Tomikawa (“Tomikawa”). Claim 5 depends from claim 1, which, as demonstrated above, is patentable over Silverbrook. Tomikawa does not remedy the deficiencies of Silverbrook. Accordingly, claim 5 is patentable over Silverbrook in view of Tomikawa.

(2) The Office Action rejects claims 12 and 16 under 35 U.S.C. § 103(a) as being unpatentable over Silverbrook in view of U.S. Patent No. 6,142,604 to Kanda (“Kanda”). Claim 12 depends from claim 1, which, as demonstrated above, is patentable over Silverbrook. Kanda does not remedy the deficiencies of Silverbrook. Accordingly, claim 12 is patentable over Silverbrook in view of Kanda.

Claim 16

Claim 16 is an independent claim, and has been amended solely to further prosecution. The Applicant submits that claim 16 is patentable over Silverbrook in view of Kanda for at least the following reasons.

First, no reasonable combination of Silverbrook and Kanda discloses or renders obvious “a plurality of ejectors each having chambers . . . spaced apart from one another along a direction of printing at a constant pitch,” as recited by claim 16. As demonstrated above with respect to claims 1 and 13, Silverbrook alone fails to disclose this claim feature. Kanda does not remedy the deficiencies of Silverbrook. Accordingly, no reasonable combination of Silverbrook and Kanda discloses or renders obvious “a plurality of ejectors each having chambers . . . spaced apart from one another along a direction of printing at a constant pitch,” as recited by claim 16.

Second, no reasonable combination of Silverbrook and Kanda discloses or renders obvious “a plate which defines an elongated feeding duct for the ink, the feeding duct extending along the direction of printing,” as recited by claim 16. As demonstrated above with respect to claims 1 and 13, Silverbrook alone fails to disclose this claim feature. Kanda does not remedy the deficiencies of

Silverbrook. Accordingly, no reasonable combination of Silverbrook and Kanda discloses or renders obvious “a plate which defines an elongated feeding duct for the ink, the feeding duct extending along the direction of printing,” as recited by claim 16.

In view of the foregoing, the Applicant submits that claim 16 is patentable over Silverbrook in view of Kanda.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant, therefore, respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

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Respectfully submitted,

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